Hearing Date: January 11, 2024 at 10:00 am Objection Deadline: January 4, 2024 at 4:00 pm

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Counsel to Ignat Tuganov

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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| In re: | | : | Chapter 11 |
| | | : | |
| CELSIUS NETWORK LLC, et al. ¹ | | : | Case No. 22-10964 (MG) |
| | | : | Jointly Administered |
| | Debtors. | : | |
| | | : | Ref: Dkt. No. 3666 |
| | | X | |

NOTICE OF FILING OF REVISED PROPOSED ORDER, PURSUANT TO 11 U.S.C. §§ 503(b)(3)(D) AND 503(b)(4), GRANTING APPLICATION OF IGNAT TUGANOV FOR ALLOWANCE AND REIMBURSEMENT OF ADMINISTRATIVE EXPENSES FOR SUBSTANTIAL CONTRIBUTION

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Celsius Network LLC (2148); Celsius KeyFi LLC (4414); Celsius Lending LLC (8417); Celsius Mining LLC (1387); Celsius Network Inc. (1219); Celsius Network Limited (8554); Celsius Networks Lending LLC (3390); Celsius US Holding LLC (7956); GK8 USA LLC (9450); GK8 Ltd. (1209); and GK8 UK Limited (0893). The location of Debtor Celsius Network LLC's principal place of business and the Debtors' service address in these chapter 11 cases is 50 Harrison Street, Suite 209F, Hoboken, New Jersey 07030.

PLEASE TAKE NOTICE that on October 2, 2023, Ignat Tuganov ("Tuganov"), a creditor in the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") and one of three class representatives (collectively, the "Class Representatives") in connection with the Official Unsecured Creditors' Committee's efforts to certify the class of account holders holding non-contract claims against the Debtors, through his counsel, filed his Application of Ignat Tuganov For Entry of an Order, Pursuant to 11 U.S.C. §§ 503(b)(3)(D) and 503(b)(4) For the Allowance and Reimbursement of Reasonable Professional Fees and Actual, Necessary Expenses in Making a Substantial Contribution to These Cases [Dkt. No. 3666] (the "Substantial Contribution Application").

PLEASE TAKE FURTHER NOTICE that Mr. Tuganov hereby files a revised *Order*, Pursuant to 11 U.S.C. §§ 503(b)(3)(D) and 503(b)(4), Granting Application of Ignat Tuganov For Allowance and Reimbursement of Administrative Expenses For Substantial Contribution, a copy of which is attached hereto as Exhibit A (the "Revised Proposed Order").

PLEASE TAKE FURTHER NOTICE that a comparison between the original proposed order filed as Exhibit A to the Substantial Contribution Application and the Revised Proposed Order is attached hereto as Exhibit B.

Dated: January 9, 2024

New York, New York

VENABLE LLP

By: <u>/s/Jeffrey S. Sabin</u>

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